

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's	)	ET Docket No. 00-258
Rules to Allocate Spectrum Below 3 GHz	)	
For Mobile and Fixed Services to Support	)	
the Introduction of New Advanced Wireless	)	
Services, including Third Generation	)	
Wireless Systems	)	
	)	
Petition for Rulemaking of the Cellular	)	RM-9920
Telecommunications Industry Association	)	
Concerning Implementation of WRC-2000;	)	
Review of Spectrum and Regulatory	)	
Requirements for IMT-2000	)	
	)	
Amendment of the U.S. Table of Frequency	)	RM-9911
Allocations to Designate the 2500-2520/	)	
2670-2690 MHz Frequency Bands for the	)	
Mobile-Satellite Service	)	

To: The Commission

**COMMENTS**

Tarrant County College submits these comments in response to the *Notice of Proposed Rule Making and Order* in the captioned proceeding, FCC 00-455 (released January 5, 2001) ("NPRM"). The NPRM explores the possibility of introducing new advanced mobile and fixed services (including Third Generation mobile services, or "3G") in various frequency bands, including the 2500-2690 MHz band currently allocated for and used by stations operating in the Instructional Television Fixed Service ("ITFS") and the Multichannel Multipoint Distribution Service ("MMDS").

Tarrant County College urges strongly that the FCC's introduction of new cell phone services cannot and must not be accomplished at the expense of ITFS and MMDS allocations in

the 2500-2690 MHz band. Preservation of these ITFS and MMDS allocations are necessary both for the continuation of pervasive and invaluable licensed uses by incumbent stations in these services and the expanding rollout of advanced wireless broadband services to schools, homes and businesses. Tarrant County College believes that the Commission has identified, and can make available, other spectrum to satisfy demand for 3G mobile, without any incursion into the 2500-2690 MHz band.

Tarrant County College uses Instructional Television Fixed Services frequencies, authorized and licensed by the Federal Communications Commission to broadcast community college programming to over thirty communities in the Fort Worth area. The Center for Distance Learning at Tarrant County College manages the program for approximately 6,600 students who participate in the largest community college distance education program in the state of Texas. Students of the community college are able to watch programming at anyone of four campus viewing locations or at home. Courses are broadcast into homes on one of six cable TV providers. The cable providers broadcast the community college programming via educational access channels in 30 cities.

Courses such as Anthropology, Biology, Business Management, English, Government, Health, History, Music, Philosophy, Psychology, and Sociology, are among the twenty-seven (27) courses scheduled over a seven-day week, twenty-four hours a day. As a public service, the Center for Distance Learning also broadcasts over 300 Public Service Announcements of interest to the general public. Courses begin simultaneously with the campus semester schedule. In the future, it is planned that courses will begin continuously so that students could start a course during any month of the year.

Tarrant County College recently implemented new digital technology in broadcast operations with the financial and technical assistance of WorldCom Broadband Solutions. As a result, the college is able to maintain the use of its four channels and have additional capacity to lease to WorldCom Broadband Solutions on an ongoing basis.

Tarrant County College is looking forward to the time when WorldCom Broadband Solutions deploys broadband services and those services can be made available to students of the College. Many additional courses are being developed for the web and students will need reliable, cost-effective broadband access to take the courses. Broadband capacity may also allow the college to reach more high school students who desire to take college courses for concurrent credit. Broadband is one technology that will lead us toward additional newer technologies which will be beneficial in the college's instructional programs.

WorldCom Broadband Solutions and Tarrant County College, working together have provided a vehicle for students to take their own educational voyage. Together we are laying the foundation for all students in the 21<sup>st</sup> century to have equal access to the information and technology in a way that best provides to them educational content, so that they may achieve their own personal and educational goals.

Tarrant County College opposes the reallocation of the 2500--2690 MHz bands for 3G services on a number of grounds. First, ITFS and MMDS licensees have been using the band for many years to provide valuable educational services to students and teachers. There are more than 1,200 licensees across the country holding over 2000 licenses, serving K-12 schools, universities, community colleges, and governmental agencies and institutions. These licensees reach hundreds of thousands or millions of students and adult/workforce learners, principally

through video programming and other related services. These services cannot be sacrificed for more sophisticated cell phones.

Recent developments in technology have made it possible for ITFS and MMDS stations to provide high-speed, two way wireless data transmission services, including for broadband Internet access. These technological innovations are particularly timely given the explosion in online education which increasingly requires broadband access to rich-media content. Wireless broadband in the 2500-2690 MHz band utilizing ITFS and MMDS channels is fast enough to support a broad range of such content, including two-way real-time video, streaming video, and other bandwidth intensive applications necessary for effective distance learning. In addition, wireless broadband provides the capability for educational institutions to build wide area networks at a reasonable cost. Educators are just beginning to realize the enormous potential of this technology. A significant number of stations are already being used for these purposes, hundreds of ITFS and MMDS licensees have applied for licenses to provide two-way service as of August, 2000, and many more are expected to apply when the opportunity arises again within the next several months.

In addition, ITFS educational licensees have become valuable “partners” of wireless communications companies through the practice of leasing capacity, or network sharing, which the FCC first allowed in 1983. The commercial counterpart of ITFS, MMDS has provided a variety of transmission services to communities around the country. Because MMDS licensees only have a limited amount of bandwidth, many ITFS licensees have joined with them to create shared networks – essentially allowing ITFS systems to be deployed and operated at the expense of the commercial partner while generating additional funds for schools to use in developing their distance learning programs. The FCC has strongly encouraged this practice. However, if

the FCC now takes channels away from these providers to make room for 3G services, the advantages of this public/private, educational/commercial collaboration will be lost.

Finally, the new ITFS/MMDS broadband wireless services are critical to bridging the digital divide – the chasm between those in the United States that have access to broadband Internet offerings and those that do not. The benefits of high-speed Internet access do not reach most Americans. DSL and cable modem services are primarily serving new, affluent, suburban neighborhoods, leaving inner cities, rural areas, and various other insular communities behind. However, with the highly favorable signal transmission and reception range of stations operating in the 2500-2690 MHz band, ITFS/MMDS stations can reach rural areas, inner-city neighborhoods, Indian reservations, and other underserved communities that cable modems and DSL cannot or will not serve. Thus, only wireless broadband – provided through ITFS and MMDS in the 2500-2690 MHz band – has the power to bridge the digital divide.


If the FCC reallocates all or part of the ITFS/MMDS spectrum for 3G services, the capacity, usefulness, and value of the ITFS spectrum would be significantly diminished if not destroyed. Even if only part of the spectrum is taken, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality service and signal interference. Moreover, the deployment of wireless broadband services through ITFS/MMDS shared networks would be stopped in its tracks, and for many communities, the promise of high-speed advanced services – either at all or at any reasonable price -- would remain beyond reach.

For all these reasons, Tarrant County College opposes any reallocation of channels in the 2500-2690 MHz band from ITFS and MMDS, and urges the FCC to move 3G mobile services into other available spectrum.

Respectfully submitted,

Tarrant County College

WHR-506

By: \_\_\_\_\_

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